

September 30, 2013

Austin, TX 5929 Balcones Drive, Suite 200 Austin, TX 78731-4280 Phone: 512.343.2544 Fax: 512.343.0119

VIA ECFS

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, S.W. Washington, D.C. 20554

RE: WC Docket Nos. 10-90 and 11-42

Annual Report Pursuant to 47 C.F.R. §§ 54.313 and 54.422

Dear Ms. Dortch:

Panhandle Telecommunication Systems, Inc., Study Area Code 439032, by its authorized representative, files its FCC Form 481 - Carrier Annual Reporting Data Collection Form in compliance with 47 C.F.R. §§ 54.313 and 54.422.

The FCC Form 481 has been completed and submitted to the Universal Service Administrative Company.

A copy of the FCC Form 481 is also being submitted to the state regulatory commission pursuant to §§ 54.313(i) and 54.422(c).

Please contact me if you have any questions.

Sincerely.

Jean Langkop

Authorized Representative for

Panhandle Telecommunication Systems, Inc.

JL/pjf

Attachment

cc: Mr. Shawn Hanson, Panhandle Telecommunication Systems, Inc.

Ms. Kelley Wells, Panhandle Telecommunication Systems, Inc.

	m 481 - Carrier Annual Reporting ollection Form		FCC Form 481 OMB Control No. 3060-09 July 2013	86/OMB Control No. 3060-0819
<010>	Study Area Code	439032		
<015>	Study Area Name	Panhandle Telecommunication Systems In	c CL	
<020>	Program Year	2014		
<030>	Contact Name: Person USAC should contact with questions about this data	Kelley Wells		
<035>	Contact Telephone Number: Number of the person identified in data line <030:	580 338-2556 >		
<039>	Contact Email Address: Email of the person identified in data line <030>	kelley.wells@ptci.net		
				54.313 54.422 Completion Completion
ANNUA	L REPORTING FOR ALL CARRIERS			Required Required
<100>	Service Quality Improvement Reporting	(complete attached wo	rksheet)	(check box when complete)
<200> <210>	Outage Reporting (voice) < check box if	(complete attached wor no outages to report	rksheet)	<i>V V</i>
<310>	Unfulfilled Service Requests (voice) Detail on Attempts (voice) Unfulfilled Service Requests (broadband) Detail on Attempts (broadband)	(attach descriptive doc		
<400> <410> <420> <430> <440> <450>	Number of Complaints per 1,000 customers (voice Fixed 0.0 Mobile Number of Complaints per 1,000 customers (broad Fixed Mobile			v v
<710> <800> <900> <1000> <1010> <1110> <1110>	Service Quality Standards & Consumer Protection 439032ok510 Functionality in Emergency Situations 439032ok610 Company Price Offerings (voice) Company Price Offerings (broadband) Operating Companies and Affiliates Tribal Land Offerings (Y/N)? Voice Services Rate Comparability Terrestrial Backhaul (Y/N)? Terms and Condition for Lifeline Customers	Rules Compliance (check to indicate certify (attached descriptive dout) (check to indicate certify) (attached descriptive dout) (complete attached woud) (complete attached woud) (if yes, complete attached woud) (if yes, complete attached woud) (if not, check to indicate certify) (complete attached woud) (complete attached woud) (complete attached woud)	cument) fication) cument) rksheet) rksheet) rksheet) rksheet) fication) cument) fication) rksheet)	
<2000> <2005>	Price Cap Carriers, Proceed to <u>Price Cap Additional</u> Including Rate-of-Return Carriers affiliated with Price Cap Additional Rate of Return Carriers, Proceed to <u>ROR Additional</u>	ice Cap Local Exchange Carriers (check to indicate certi) (complete attached wo	rksheet)	
<3000> <3005>		(check to indicate certij (complete attached wo		

	ervice Quality Improvement Reporting Illection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013				
<010>	Study Area Code 439032						
<015>	Study Area Name Panhandle	elecommunication Systems Inc CL					
<020>	Program Year 2014						
<030>	Contact Name - Person USAC should contact regarding this data Kelley Wells						
<035>	Contact Telephone Number - Number of person identified in data line <030> 5	338-2556					
<039>	Contact Email Address - Email Address of person identified in data line <030>	elley.wells@ptci.net					
<110>	Has your company received its ETC certification from the FCC?	(yes / no) O					
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no)					
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your concept to address voice telephony service.	npany is a					
	Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	Name of Attached Docur	ment (.pdf)				
<113>	Maps detailing progress towards meeting plan targets						
<114>	Report how much universal service (USF) support was received						
<115>	How (USF) was used to improve service quality						
<116>	How (USF)was used to improve service coverage						
<117>	How (USF) was used to improve service capacity						
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.						

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	439032	
<015>	Study Area Name	Panhandle Telecommunication Systems Inc CL	
<020>	Program Year	2014	
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells	
<035>	Contact Telephone Number - Number of person identified in data line <030> 580 338-2556		
<039>	Contact Email Address - Email Address of person identified in data line <030> kelley.wells@ptci.net		

<220>	<a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h></h>
	NORS	0.1	0.1	0.151	0.1	N. orboves		044 5 - 1111	Section Colors	Did This Outage		
	Reference		Outage Start		Outage End	Number of	Tatal November of	911 Facilities	Service Outage	Affect Multiple	Camilas Outana	Dura variation
	Number	Date	Time	Date	Time	Customers Affected	Total Number of	Affected	Description (Check	Study Areas	Service Outage	Preventative
							Customers	(Yes / No)	all that apply)	(Yes / No)	Resolution	Procedures
							See attache	d				
								u				
						WC	rksheet					
										·		·
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(700) Price Offerings including Voice Rate Data	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	439032	
<015>	Study Area Name	Panhandle Telecommunication Systems Inc CL	
<020>	Program Year	2014	
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells	
<035>	Contact Telephone Number - Number of person identified in data line <	<030> 580 338-2556	
<039>	<039> Contact Email Address - Email Address of person identified in data line <030> kelley.wells@ptci.net		
<701>	Residential Local Service Charge Effective Date 1/1	/2013	
<702>	Single State-wide Residential Local Service Charge		

<703>	<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
					Residential Local			Mandatory Extended Area	
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
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					See att	ached worksheet			
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(710) Broadband Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	439032		
<015>	Study Area Name	Panhandle Telecommunication Systems Inc CL		
<020>	Program Year	2014		
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells		
<035>	Contact Telephone Number - Number of person identified in data line <030> 580 338-2556			
<039>	Contact Email Address - Email Address of person identified in data line <030> kelley.wells@ptci.net			

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c></c>	<d1></d1>	<d2></d2>	<d3></d3>	<d4></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select }
				e attached					
			work	sheet					
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(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code		439032	
<015>	Study Area Name		Panhandle Telecommunication Systems Inc CL	
<020>	Program Year		2014	
<030>	Contact Name - Person l	USAC should contact regarding this data	Kelley Wells	
<035>	Contact Telephone Number - Number of person identified in data line <030> 580 338-2556			
<039>	Contact Email Address - Email Address of person identified in data line <030> kelley.wells@ptci.net			
<810>	Reporting Carrier Panhandle Telecommunication Systems, Inc.			
<811>	Holding Company Panhandle Telephone Cooperative, Inc. (SAC 432016)			
<812>	Operating Company	Panhandle Telecommunication Systems, In	с.	

<813>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
-			
-	See a	ttached works	heet
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	bal Lands Reporting lection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	439032		
<015>	Study Area Name	Panhandle Tele	communication Systems Inc CL	
<020>	Program Year	2014	2,200	
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells		
<035>	Contact Telephone Number - Number of person identified in data line	e <030> 580 338-	2556	
<039>	Contact Email Address - Email Address of person identified in data line	e <030> kelley.	wells@ptci.net	
<910>	Tribal Land(s) on which ETC Serves	Ji	carilla Apache Nation (verifying	3)
<920>	Tribal Government Engagement Obligation If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal		39032ok920 ame of Attached Document (.pdf)
<921>	government pursuant to § 54.313(a)(9) includes: Needs assessment and deployment planning with a focus on Tribal community anchor institutions;	Select (Yes,No, NA)		
<922>	Feasibility and sustainability planning;	NA		
<923>	Marketing services in a culturally sensitive manner;	NA		
<924>	Compliance with Rights of way processes	NA		
<925>	Compliance with Land Use permitting requirements	NA		
<926>	Compliance with Facilities Siting rules	NA		
<927>	Compliance with Facilities Siting rules Compliance with Environmental Review processes	NA NA		
		NA NA		
<928>	Compliance with Cultural Preservation review processes			
<929>	Compliance with Tribal Business and Licensing requirements.	NA		

(1100) No Terrestrial Backhaul Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	439032
<015>	Study Area Name	Panhandle Telecommunication Systems Inc CL
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	580 338-2556
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)	
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)	

Lifeline	erms and Condition for Lifeline Customers ection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
40105	Shorts Area Code		439032	
<010>	Study Area Name		Panhandle Telecommunication Systems	Inc CL.
<015> <020>	Study Area Name Program Year		2014	inc. ci
<030>	Contact Name - Person USAC should contact regarding this data		Kelley Wells	
<035>	Contact Telephone Number - Number of person identified in data	ine <030>	580 338-2556	
<039>	Contact Email Address - Email Address of person identified in data			
<1210> <1220>	Terms & Conditions of Voice Telephony Lifeline Plans Link to Public Website		ame of attached document (.pdf)	
	"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:			
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	V		
<1222>	Details on the number of minutes provided as part of the plan,	V		
<1223>	Additional charges for toll calls, and rates for each such plan.	~		

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(2000) Pr	ice Cap Carrier Additional Documentation	FCC Form 481
Data Coll	ection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Includina	Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	July 2013
meraanig	Trace of Netarin Carriers affinacea with the Cap 200al Exertainge Carriers	
		2022
<010>	Study Area Code	0032
<015>	,	nhandle Telecommunication Systems Inc CL
<020>	Program Year 20	
<030>		ley Wells
<035>	Contact Telephone Number - Number of person identified in data line <030>	580 338-2556
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net
CHECK +	ne hoves helow to note compliance as a recipient of Incremental Connect Amer	ca Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II
CHECK	· · · · · · · · · · · · · · · · · · ·) the information reported on this form and in the documents attached below is accurate.
	5upport us set fortil in 47 cr it 3 54/525(b))(c))(u))(, the mornation reported on this form the mane declaricing attached scion is declared.
	Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}	
<2011>	3rd Year Certification (47 CFR § 54.313(b)(2))	
\2011>	31d Teal Certification (47 Cr it § 34.313(b)(2))	
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))	
<2012>	2013 Frozen Support Certification	
<2012>	2014 Frozen Support Certification	
<2014>	2015 Frozen Support Certification	
<2015>	2016 and future Frozen Support Certification	
120137	2010 and ratare reasons support sertification	
	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
<2016>	Certification Support Used to Build Broadband	
.2010	certification support oscia to Saina Stodasaina	<u> </u>
	Connect America Phase II Reporting {47 CFR § 54.313(e)}	
<2017>	3rd year Broadband Service Certification	
<2018>	5th year Broadband Service Certification	
<2019>	Interim Progress Certification	
<2020>	Please check the box to confirm that the attached PDF, on line 2021,	
-2020	contains the required information pursuant to § 54.313 (e)(3)(ii), as a r	rinient
	of CAF Phase II support shall provide the number, names, and addresse	·
	community anchor institutions to which began providing access to broad	
	service in the preceding calendar year.	
<2021>	Interim Progress Community Anchor Institutions	Name of Attached Document Listing Required Information
120217	mermi rogicss community Anchor institutions	Traine of Actuation Social City Esting Required Information

(3000) Ra	ate Of Return Carrier Additional Documentation		FCC Form 481
Data Coll	ection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
-	439032		
<010> <015>	Study Area Code Study Area Name Panhandl	e Telecommunication Systems Inc CL	
<020>	Program Year 2014	e Telecommunication Systems Inc Ch	
<030>	rrogram real	lley Wells	
<035>	Contact Telephone Number - Number of person identified in data line <030>	580 338-2556	
<039>	Contact Email Address - Email Address of person identified in data line <030>	kelley.wells@ptci.net	
CHECK t	he boxes below to note compliance on its five year service quality plan (pursu CFR § 54.313(f)(2). I further certify that	ant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring the information reported on this form and in the documents attacl	
	Progress Report on 5 Year Plan		
(3010)	Milestone Certification $\{47\ CFR\ \S\ 54.313\{f\}\{1\}[i]\}$ Please check this box to confirm that the attached PDF , on line 3012,	Name of Attached Document Listing Required Information	
(3011)	contains the required information pursuant to § 54.313 (f)(1)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.		
(3012) (3013) (3014)	Community Anchor Institutions {47 CFR § 54.313{f}(1)(ii)} Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:	Name of Attached Document Listing Required Information	(Yes/No) (Yes/No)
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		
(3016)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, Is your company audited?		(Yes/No)
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications		
(3020)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.		
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, Underlying information subjected to a review by an independent certified public accountant		
(3024)	Underlying information subjected to an officer certification.		
(3025)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	439032	
<015>	Study Area Name	Panhandle Telecommunication Systems Inc CL	
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<030>	Contact Name - Perso	on USAC should contact regarding this data Kelley Wells	
<035>	Contact Telephone N	umber - Number of person identified in data line <030> 580 338-2556	
<039>	Contact Email Address - Email Address of person identified in data line <030> kelley.wells@ptci.net		

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: Signature of Authorized Officer: Date Printed name of Authorized Officer: Title or position of Authorized Officer: Telephone number of Authorized Officer: Filing Due Date for this form: Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment

under Title 18 of the United States Code, 18 U.S.C. § 1001.

	Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	439032	
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<020>	Program Year	2014	
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<035>	Contact Telephone Number - N	umber of person identified in data line <030> 580 338-2556	
<039>	Contact Email Address - Email A	ddress of person identified in data line <030> kelley.wells@ptci.net	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Date: 09/30/2013
for this form: 10/15/2013
1

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier					
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.					
Name of Reporting Carrier: Panhandle Telecommunication Systems Inc CL					
Name of Authorized Agent or Employee of Agent: Jean Langkop					
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:	09/30/2013			
Printed name of Authorized Agent or Employee of Agent: Jean Langkop					
Title or position of Authorized Agent or Employee of Agent Director - Business Compliance					
Telephone number of Authorized Agent or Employee of Agent: 512 343-2544					
Study Area Code of Reporting Carrier: 439032 Filing Due Date for this form:	10/15/2013				
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communicatio 18 of the United States Code, 18 U.S.C. § 10		fine or imprisonment under Title			

Attachments

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code		439032
<015>	Study Area Name		Panhandle Telecommunication Systems Inc CL
<020>	Program Year		2014
<030>	Contact Name - Person US	SAC should contact regarding this data	Kelley Wells
<035>	Contact Telephone Numb	er - Number of person identified in data line <030	> 580 338-2556
<039>	Contact Email Address - Email Address of person identified in data line <030> kelley.wells@ptci.net		
<810>	Reporting Carrier	Panhandle Telecommunication Systems, Inc	•
<811>	Holding Company	Panhandle Telephone Cooperative, Inc. (S.	AC 432016)
<812>	Operating Company	Panhandle Telecommunication Systems, Inc	

<813>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
=	Panhandle Telecommunication Systems, Inc.	439008	PTCI
<u>-</u>	Panhandle Telecommunications Systems, Inc.	449019	PTCI
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LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

Panhandle Telecommunication Systems, Inc. (PTSI or the Company) certifies its compliance with applicable service quality standards and consumer protection rules as required by the Oklahoma Corporation Commission (OCC) and the Federal Communications Commission (FCC).

PTSI is a commercial mobile radio service (CMRS) provider licensed by the FCC and received its designation as an eligible telecommunications carrier (ETC) from the OCC. As an ETC, the Company is required to comply with representations made to the OCC in its application for ETC designation including, among other things, quality of service, and customer service.

PTSI is bound by the requirements of OAC 165:55-23-1 *et seq.* rules pertaining to the provision of supported services by designated wireless carriers. The rules address, among other things, content of bills, billing disputes, minimum service standards, responsibility for adequate and safe service, records of trouble reports and response to customer complaint inquiries. The Company must notify the OCC of any service interruptions it believes may cause a high degree of public interest or concern. PTSI is also required to have a written restoration of service plan that is to be followed during interruptions in supported services of which the OCC is to be notified under OAC 165:55-13-52 (i.e., interruptions that affect the entire system, a major division thereof, or in the Company's judgment, may cause a high degree of public interest or concern).

PTSI complies with all federal requirements, including the FCC's Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011). Certification of the Company's compliance with CPNI rules and a description of the Company's operating procedures that ensure compliance are filed at the FCC annually.

LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Panhandle Telecommunications Systems, Inc. (PTSI or the Company) is able to function in emergency situations. The Company has a reasonable amount of back-up power to ensure functionality without an external power source. PTSI's system is reinforced by battery back-ups installed at its cell sites and generators at its Mobile Telephone Switching Office. The Company also has numerous portable generators that are available to be moved to any of the cell sites. In addition, the cell sites are constantly monitored by the switch which alerts the answering service dispatch in the event trouble is detected. The network is capable of managing traffic spikes resulting from emergency situations.

PTSI is able to reroute traffic around damaged facilities. Although the Company's ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

Line 920 - Tribal Government Engagement Obligation

Panhandle Telecommunications Systems, Inc. (the Company's) service area includes "former reservations" in Oklahoma. The Company was not able to clearly identify the tribes associated with the former tribal land served and sent letters on November 8, 2012 "return receipt requested" to all of the tribes in Oklahoma as listed below. The letters were addressed to the contacts as provided by the National Congress of American Indian's Tribal directory. Each letter requested that the Tribal government representative contact the Company to engage in discussions or acknowledge that they have no tribal interest in the Company's service area and decline to engage in discussions. Following is the status of the attempted contacts.

Cherokee Nation – On November 15, 2012 the Company was advised by a representative of Cherokee Nation that they have no facilities, assets, or group of members needing communication services, and declined further discussions.

Jicarilla Apache Nation - A map was returned that indicates an interest the Jicarilla Apache Nation possibly has in the western portion of the Company's service area. Former Oklahoma tribal maps utilized by the Company indicated that area was served by the Concho Agency and by the end of 2012 the Company was trying to determine the "former reservation" area under Jicarilla Apache Nation's jurisdiction to engage in further discussions.

Comanche Nation – A signed receipt was received on November 14, 2012. By the end of 2012, the Company had not been contacted by any representative of the Tribal government.

United Keetoowah Band of Cherokee Indians - A signed receipt was received on November 13, 2012. By the end of 2012, the Company had not been contacted by any representative of the Tribal government.

Cheyenne and Arapaho Tribes - A signed receipt was received on November 13, 2012. By the end of 2012, the Company had not been contacted by any representative of the Tribal government.

Kiowa Tribe of Oklahoma - A signed receipt was received on November 13, 2012. By the end of 2012, the Company had not been contacted by any representative of the Tribal government.

¹ FCC Public Notice, DA12-1165, released July 19, 2012, footnote 2, states, "In the context of the *USF/ICC Transformation Order*, "Tribal lands" is defined as "any federally recognized Indian tribe reservation, pueblo or colony, including former reservations in Oklahoma…"